

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

-----X
CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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WHEREAS, defendants/third-party plaintiffs Safa Abdulrahim Gelardi and IME Companions, LLC, filed a third-party complaint against third-party defendant Carlos Roa on March 23, 2022; and

Case No.: 1:22-cv-1032 (PKC)(JRC)

**STIPULATION AND ORDER
OF VOLUNTARY DISMISSAL
OF THIRD-PARTY ACTION
AND THIRD-PARTY
COUNTERCLAIMS**

WHEREAS, third-party defendant Carlos Roa filed an answer to the third-party complaint with counterclaims against third-party counter-defendants Safa Abdulrahim Gelardi, IME Companions, LLC, and Vito Gelardi on May 5, 2022; and

WHEREAS, third-party plaintiffs/third-party counter-defendants Safa Abdulrahim Gelardi, IME Companions, LLC, and Vito Gelardi and third-party defendant/third-party counter-claimant Carlos Roa seek to resolve the issues alleged in the third-party complaint and third-party counterclaims and have negotiated in good faith for that purpose; and

WHEREAS, none of the parties hereto is an infant or incompetent person; and

WHEREAS, the parties hereto wish to discontinue the third-party action and third-party counterclaims;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties and/or their respective attorneys that the third-party action is voluntarily dismissed, with prejudice, as against third-party defendant/counter-claimant Carlos Roa and that the counterclaims of third-party defendant Carlos Roa as against third-party plaintiffs/third party counter-defendants Safa Abdulrahim Gelardi, IME Companions, LLC, and Vito Gelardi are hereby dismissed, with prejudice, pursuant to Federal Rules of Civil Procedure § 41(a)(1)(A)(ii).

Dated: New York, New York
February 21, 2024

WARNER & SCHEUERMAN
Attorneys for Third-Party Plaintiffs/
Third-Party Counter-Defendants
Safa Abdulrahim Gelardi, Vito Gelardi
and IME Companions, LLC

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By: /s/ Jonathon D. Warner
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SO ORDERED:

U.S.M.J.